

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Patent Application of:
Brigido A. Borquez (U.S. Patent Application)

Ser. No. : 09/599,817

Art Unit: 2654

Filed: June 23, 2000

Examiner: Qi Han

For: METHOD AND SYSTEM FOR CONSECUTIVE TRANSLATION FROM A SOURCE
LANGUAGE TO A TARGET LANGUAGE VIA A SIMULTANEOUS MODE

DECLARATION OF DEBORAH WORSLEY UNDER C.F.R. 1.132

I, Deborah Worsley, after being duly sworn on the hereinafter declaration, depose and declare as follows:

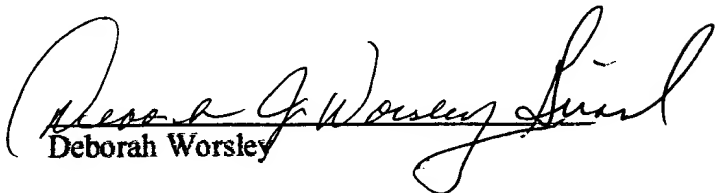
1. I currently hold an AA degree from Ferris State College, Big Rapids, Michigan.
2. I am currently a stenographer certified to work in the courts of the State of Arizona, and have been regularly employed as a stenographer for a period of more than 32 years.
3. I have personal knowledge of the facts contained in this Declaration. I am competent to testify as to the matters stated herein.
4. I am employed by Worsley Reporting, Inc. in Phoenix, Arizona and have been since November of 1995. My job title at Worsley Reporting, Inc. is Court Reporter.

5. I have reviewed and understand the Patent No. 5,884,256 entitled “NETWORKED STENOGRAPHIC SYSTEM WITH REAL-TIME SPEECH TO TEXT CONVERSION FOR DOWN-LINE DISPLAY AND ANNOTATION” granted to James D. Bennett et al (hereinafter Bennett).
6. The invention of Bennett is a stenography system for transcribing verbal speech. The system converts the verbal speech into text that may be viewed and annotated in real time during a court proceeding. The conversion is aided by keying of phonemes by a human stenographer, which does not entail translation from one language to a distinct language. The conversion is also aided by machine conversion of the phonemes into text, which does not entail translation from one language into another distinct language.
7. The disclosure of Bennett regarding translation from one language to another language is to be implemented automatically by a machine of the system and not by a human translator.
8. It would be counterintuitive for a human translator to use the system of Bennett for the purpose of replaying recorded verbal speech in a first language in order to translate the verbal speech into a second language different from the first language during a court proceeding.
9. The system of Bennett utilizes flags or markers within the storage media for marking recorded speech so that particular portions of the recorded speech may be selectively searched for and located after the court proceeding for verification purposes and to perfect the court record when necessary.
10. Any attempt by a human translator to use the system of Bennett to replay and translate verbal speech from one language, and deliver a translation in a different language during a court proceeding would interrupt and delay the court proceeding in a manner that in my opinion would be unacceptable to most judges.

11. A reason that the system of Bennett would not work for a human translator is that the system of Bennett was not designed for a human translator/interpreter. Rather, the system of Bennett was designed for stenographers and court reporters.
12. In my opinion, it would not occur to a court translator/interpreter of average skill and experience to attempt to use the system of Bennett to play back recorded speech during a court proceeding for the purpose of real time translation that is expected of court translators/interpreters.
13. Overall it would not be obvious to stenographers, court recorders, or court room translators/interpreters to use the system of Bennett for instantaneous playback and interpretation by a human translator during a court proceeding.
14. The undersigned being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful false statements may jeopardize the validity of any patent directed to the same invention, declares that she is properly authorized to execute this Declaration on behalf of the applicant; she believes the applicant to be the owner of the invention at issue; the invention is the subject matter of the above referenced patent application; and all statements made of her own knowledge are true and all statements made on information and belief are believed to be true.

FURTHER, DECLARANT sayeth not.

Dated: 10-14-05


Deborah Worsley